

# Arkansas Wildlife Federation

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*"Your voice for hunting, fishing and conservation 64 years"*

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January 31, 2000

Memphis District, U. S. Army Corps of Engineers  
Att: CEMVM-PM-E  
167 North Main St.  
Room B-202  
Memphis, Tennessee 38103-1894

## **Comments and Position of the Arkansas Wildlife Federation Regarding the Grand Prairie Demonstration (Irrigation) Project**

The Arkansas Wildlife Federation (AWF) believes it is very important for all of us to remember one important reason the Grand Prairie is facing underground water supply problems. For decades, the government, other entities, and private landowners have encouraged the clearing and draining of wetlands. As one conservationist said, the government helped pay to get water out of the region and now through the planned irrigation project, the government is paying to put the water back.

As everyone knows, one of the most important functions of a wetland is to re-charge underground water supplies. As more land was put into crop production, water supply needs expanded in the region, but the number of wetland acres decreased, making the situation even more critical.

Our organization realizes that adequate water supplies are crucial to rice farmers and other citizens in the Grand Prairie now and in the future. We also understand that there could be some fish and wildlife benefits associated with the proposed irrigation project.

On the other hand, we are keenly aware that the proposed project is highly controversial among the landowners who farm on the Grand Prairie. According to irrigation district officials, as of the morning of Jan. 31, 2000, only 406 of the 1,062 landowners who irrigate crops in the Grand Prairie have agreed to be part of the project. To form the legal entity necessary to sponsor the project, more than 50 percent of the 1,062 landowners must sign the district's petitions. In other words, the district needs at least 126 more landowners to sign up by Feb 29, 2000.

The estimated cost of the project is nearly \$300 million dollars, of which Grand Prairie landowners would have to pay approximately \$100 million. The Arkansas Wildlife Federation believes the cost of the project is too high considering the relatively small amount of support it has from citizens who may have the most to gain from the project. Wouldn't it be a tragedy if this project were built because 532 landowners (one landowner more than 50 percent of 1,062 landowners) supported it. Those others who opposed it could be subjected to having portions of their property taken by eminent domain, and their assessments on their property could go up from \$1 to \$3 even though they did not use a drop of water from the irrigation project.

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The AWF is also opposed to the Grand Prairie Demonstration Project because the Army Corps of Engineers has no experience in building this type of project in our region of the United States. That's one reason why it is called a "demonstration" project. It is very optimistic to believe the complex "plumbing system" spread throughout the Prairie will work exactly as the Corps believes it will. It is certain changes will be made in the future when problems arise. Just look at the Corps' navigation projects. The Corps is supposed to be an expert in navigation construction, but the agency is always needing more funds from Congress to correct unanticipated problems on the nation's waterways. The tens of millions of dollars presently being spent on Montgomery Point Lock and Dam (located on the White River Entrance Channel) illustrate this point very clearly.

The AWF is presently opposed to the Irrigation Project because many of its aspects are voluntary. The Grand Prairie Area Demonstration Project bases some important data on the assumptions that participants will voluntarily implement certain key features. In order to make the project more acceptable, voluntary elements of the project should be made mandatory and certain other issues must be addressed. Listed below are several points of concern:

- \* Cumulative impacts of all projects involving the White River should be addressed in detail. This study should include, but not be limited to, the demands of navigation, agricultural irrigation, and regulated flow releases from the reservoirs.

- \* Water conservation measures, such as tailwater recovery systems, on farm reservoirs, and reduced aquifer pumping must be made a mandatory part of the project for all participants.

- \* Irrigation canals and on-farm reservoirs must not be located in wetlands and natural heritage sites. This is not guaranteed now.

- \* The increased availability of water should not be used as a reason to increase the amount of wetlands or bottomland hardwoods to be cleared and farmed in the future.

- \* Some type of recreational development or enhancement of wildlife habitat for public use should be made part of the project.

- \* The project stated that the (voluntary) annual flooding of 38,529 acres of harvested rice fields would provide for an additional 12,275,949 duck-use-days per year. Flooding of agricultural land for waterfowl feeding and rest areas should be made a mandatory part of the project.

- \* Even though the Corps has agreed to monitor irrigation water return flows, serious water quality concerns still remain.

The Arkansas Soil and Water Commission should not be in the position of being the agency that establishes minimum stream flows, the agency that approves permits to withdraw water, and the agency that provides funding. These responsibilities are in conflict.

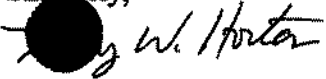
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Representatives of the AWF have met with supporters and opponents of the irrigation project. In summary, the project has been in the planning stages for years, but it still has very little support from the farmers on the Prairie who know better than anyone else how best to meet their needs. The impacts to fish and wildlife are extremely difficult to determine because so many of the items designed to benefit the resources are not mandatory portions of the project. It is also unknown how this project, the proposed expansion of the navigation channel and other expected irrigation projects on the Lower White River will cumulatively impact the entire Lower White River area. That's why a comprehensive study is needed before this or other major projects are undertaken.

The Arkansas Wildlife Federation is one of the state's oldest and largest private, nonprofit, conservation organizations. Our members represent a broad spectrum of Arkansans, from farmers, ranchers, loggers, and teachers to biologists, physicians, business owners, and others interested in donating their time and/or money for conservation. This year, we are celebrating our 64th Anniversary.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry W. Horton".

Terry W. Horton  
Executive Director